

1 WILLIAM BLUMENTHAL
General Counsel
2 JANICE L. CHARTER Colo. Bar No. 12750
3 DAVID M. NEWMAN Cal. Bar No. 54218
THOMAS DAHDOUH N.Y. Bar No. 2222370
4 Federal Trade Commission
901 Market Street, Suite 570
5 San Francisco, CA 94103
Phone (415) 848-5100/ Fax (415) 848-5184
6 jcharter@ftc.gov; dnewman@ftc.gov; tdahdouh@ftc.gov

7 ATTORNEYS FOR PLAINTIFF
FEDERAL TRADE COMMISSION
8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

11
12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.
15

NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.
17
18

Case No. C08-1718-VRW

STIPULATION FOR ORDER
EXTENDING DEADLINE FOR FILING
RESPONSIVE PLEADINGS AND
~~PROPOSED~~ ORDER

20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade
22 Commission's (the "FTC") Complaint is currently due on Monday, August 3, 2009;

23 WHEREAS plaintiff's counsel and defendants have reached agreement on a settlement,
24 and Commission staff is prepared to recommend that the Commission approve that settlement;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses
26 to Plaintiff's Complaint while the Commission considers that recommendation;

27 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and
28 Defendants, through their respective counsel, that Defendants' time to move, answer or

1 otherwise respond to the Complaint shall be and hereby is extended to and including November
2, 2009; and

3 IT IS FURTHER STIPULATED that the Case Management Conference, currently
4 scheduled for September 24, 2009, at 3:30 p.m., be rescheduled to December ¹⁷~~21~~, 2009, at 3:30
5 p.m., and that the date for filing the Case Management Statement be extended to December 11,
6 2009.

7

8 Dated: 7/22/2009 /s/
9 MICHAEL C. LYNCH
D. REED FREEMAN
10 KELLEY DRYE & WARREN LLP
ATTORNEY FOR DEFENDANTS

11 Dated: 7/22/2009 /s/
12 JANICE L. CHARTER
DAVID M. NEWMAN
13 THOMAS N. DAHDOUH
ATTORNEYS FOR PLAINTIFF

14

15

ORDER

16

PURSUANT TO STIPULATION, IT IS SO ORDERED.

17

18 Dated: September 17, 2009



19

20

21

22

23

24

25

26

27

28